

UNITED STATES DISTRICT COURT

for the

District of Puerto Rico

United States of America

v.

[1] Joselito TAVERAS,
 [2] Miguel JIMENEZ,
 [3] Alberto DOMINGUEZ,

Case No.

14-150 (M)



Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 24 - 28, 2014 in the county of _____ in the
 Judicial _____ District of Puerto Rico, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. 963

Conspiracy to Import Into the Customs Territory of the United States five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine.

21 U.S.C. 846

Conspiracy to possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

AUTHORIZED BY
 NW
 AUSA CONTRERAS

☒ Continued on the attached sheet.

Complainant's signature

John Curtiss, Special Agent, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/29/2014City and state: Hato Rey, Puerto Rico

Judge's signature

Marcos E. Lopez
 Silvia Carroño-Gott, Magistrate Judge

Printed name and title

INTRODUCTION

I, John Curtiss, employed as a Special Agent (SA) with the Drug Enforcement Administration (DEA), United States Department of Justice, having been duly sworn, do hereby depose and state:

1. I have been employed as a Special Agent with DEA since January of 2013. Currently I am assigned to the DEA Caribbean Division, San Juan, Puerto Rico Office, conducting investigations of large-scale drug trafficking organizations, violent gangs and federal narcotics violations, under Title 21, United States Code.
2. Except as otherwise noted, the statements contained in this affidavit are based in part on information provided by other law enforcement officers and my experience as a DEA Special Agent. Unless otherwise noted, wherever in this affidavit I assert that a statement was made or the information was provided by another law enforcement officer, the officer in question may have direct or hearsay knowledge of the subject matter of the statement. I have not set forth all of the facts uncovered during this investigation in preparing this affidavit.
3. I make this affidavit in support of a criminal complaint concerning federal felony offenses enumerated in Title 21, United States Code, to wit, Title 21 United States Code, Sections 963 and 846.

FACTS OF THE CASE SUPPORTING PROBABLE CAUSE

4. On January 27, 2014, a "yola" type vessel with three passengers aboard was encountered by the United States Coast Guard (USCG) in the high seas off the northeast coast of the Dominican Republic. The USCG approached the vessel and identified themselves to the passengers on the boat. The individuals aboard the yola identified themselves as Joselito TAVERAS, Miguel JIMENEZ, and Alberto DOMINGUEZ. They stated that they were Dominican nationals and that they were transporting approximately 116 bricks of cocaine from the Dominican Republic to Puerto Rico. Members of the USCG observed several large packages in the yola, in open view, situated among and around TAVERAS, JIMENEZ, and DOMINGUEZ. The passengers aboard the yola then requested to be taken aboard the coast guard cutter Farallon since their vessel was rapidly taking on water. The bricks of cocaine were also transferred to the USCG cutter Farallon and field tested. The substances inside the bricks tested positive for the presence of cocaine. On January 28, 2014, DEA agents took custody of bricks, which had an approximate weight of 137 kilograms.
5. In post-Miranda statements made to DEA agents, TAVERAS, JIMENEZ, and DOMINGUEZ stated that they found the narcotics on a beach in the Dominican Republic and agreed with each other to smuggle the drugs to Puerto Rico. They further stated that

they then purchased a yola and headed to Puerto Rico. They also stated that they were going to sell the drugs to the first interested party.

CONCLUSION

6. Based upon the foregoing, I believe there is probable cause that Joselito TAVERAS, Miguel JIMENEZ, and Alberto DOMINGUEZ committed a federal felony offense in violation of Title 21, United States Code, Sections 963 and 846.



John Curtiss
Special Agent
Drug Enforcement Administration

Subscribed and sworn to before me this 29th day of January, 2014.



~~Silvia Carreño Coll~~ Marcos E. López
United States Magistrate Judge
District of Puerto Rico